

EXHIBIT E

Barbara of the family Hill

Claimant,

- against -

CITY OF NEW YORK; NEW YORK CITY
DEPARTMENT of EDUCATION,

Defendants

-----X
To: Office of the City Comptroller
Bureau of Law and Adjustment
1 Centre Street, Room 1225
New York, New York 10007

Hon. Sylvia O. Hinds-Radix
Corporation Counsel
New York City Law Department
100 Church Street
New York, New York 10007

New York City Department of Education
52 Chambers Street
New York, N.Y. 10007

PLEASE TAKE NOTICE that the Claimant hereby makes claim and demand against the individuals and groups named in the caption above:

1) Barbara Hill, [REDACTED]

2) The nature of the claim:

This claim seeks recovery for monetary damages and back pay plus interest for the harm caused to Claimant's reputation, livelihood, and career; additionally for the distress, suffering, mental, emotional, and physical anguish and impairment of Claimant's ability to secure future employment, and impairment of earning power inflicted upon the Claimant due to the negligence, carelessness, recklessness, and misfeasance, malfeasance, and negligent acts practices, and/or omissions of the Defendants. Claimant's rights under the Constitution, both

INTEROFFICE TRANSMISSION
2023 MAY 15 A 8:41
CENTRAL IMAGING FACILITY

NYC COMPTROLLER
BUREAU OF LAW & ADJUSTMENT
CLAIMS SUPPORT DIVISION
RECEIVED
2023 MAY 12 P 2:13

Federal and State, city and State Human Rights Laws, NYS Administrative Code, as well as employment rights under current contracts. The claimant now seeks to be made whole.

3) The time when, the place where, and the manner in which the claim arose

On September 20, 2021, 9:42PM; I applied for Covid -19 Vaccine Related Accommodation. September 22, 2021, 11:13PM, I received an application determination letter via email indicating that I failed to meet the criteria for religious accommodation. The New York City Department of Education (DOE) states in their email to me on September 22, 2021, DOE cannot offer another site as accommodation as that would impose an undue hardship on the DOE and its operations. The discrimination has resulted in me being placed on unpaid leave, where I cannot work and will not receive compensation, cannot use sick time, cannot enter my work or school site. I have been segregated from my colleagues and peers and singled out because of my religious beliefs, medical condition and genetic information.

On October 2, 2021, 3:09PM; beginning December 1, 2020¹, the Department of Education (DOE) will seek to unilaterally separate my employment if I have not selected separation with benefit or extend leave without pay.

On December 7, 2021, termination of Early Intervention Caseload from private Agency.

On December 31, 2021 Continuation of Prior Executive Orders

On January 1, 2022 Emergency Executive Order No. 1

On February 14, 2022, City of New York Reasonable Accommodation Appeals Panel denied my appeal. Eric Leroy Adams treat if I remain non-compliant with the New York City Health Commissioner's Order requiring vaccination of all New York City Department of Education (NYCDOE) staff, have not already opted to separate or extend your Leave without pay (LWOP), and do not opt within 7 calendar days of the notice of the citywide panel's denial of your appeal to extend your LWOP or return from LWOP status, you will be terminated from service with the NYCDOE. NYCDOE threatens the removal of all health insurance coverage through the City will also cease upon termination.

On March 1, 2022, David Campbell emailed a letter to David C Banks stating "Pursuant to the procedures set forth in Article 18 of the Collective Bargaining Agreement covering Physical Therapists, the United Federation of Teachers (UFT) requests a conference with you or your designated representative to discuss the following complaint. The complaint is that on February 11, 2022, the grievant was improperly terminated. This is a clear violation of Articles 2, 19 and 21. As a remedy, we request that the grievant be reinstated to his/her position and made whole in all ways. The employee shall be represented at the conference by a representative designated by the Union."

On March 15, 2022, termination of health insurance from NYCDOE for my family.

On May 5, 2022, David Campbell emailed a letter stating the Department of Education has officially informed the UFT that they will not be scheduling step two (2) conference for those who filed grievances due to termination for not complying with the vaccine mandate product.

¹ Notice to Principal is Notice to Agent Notice to Agent is Notice to Principal

On February 10, 2023, the NYC Department of Education's COVID Mandate was ended by Mayor Eric Adams. The claimant has sent out emails to the employer requesting reinstatement and/or backpay, and has received either no answer or, that Claimant cannot get backpay or return to a job with the same salary. The claimant objects to this punishment as unlawful.

On or about February 10, 2023 Claimant became aware that their fingerprints remained tagged in the New York City Department of Education's 'Problem Code' at the Human Resources Office of Personnel Investigations, but was never told why. The 'Problem Code' is used for employees who have committed what the New York City Department of Education considers misconduct. Therefore the New York City Department of Education has considered Claimant guilty of some kind of misconduct without giving the Claimant a chance to clear the codes from the personnel file and database.

At present Claimant remains coded for an unknown act of misconduct, with a career that has been broken and tarnished by the unlawful acts cited herein.

4) The items of damage or injuries claimed are:

damages to reputation; emotional distress; impairment of Claimant's ability to secure future employment; impairment of earning power; tortious interference with business relations; malicious prosecution; abuse of process; fraud; and retaliation, defamation, libel, and slander. The claimant remains targeted, ostracized, and punished for not getting the COVID vaccine. The claimant demands that all rights to due process be honored and Claimant is made whole.

The Department has criminalized Claimant's rights to due process. The items of damage or injuries claimed amount to \$2 million dollars

The claim and demand are hereby presented for adjustment and payment.

PLEASE TAKE FURTHER NOTICE that by reason of the foregoing, in default of the City of New York and the listed Defendants to pay the Claimant within the time limit for compliance with this demand by the applicable statutes, Claimant intends to commence an action against the City of New York and the listed Defendants to recover damages with interest and costs.

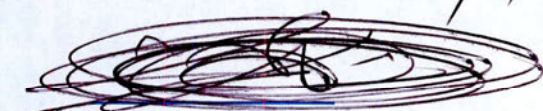
Dated: 5/9/2023

Barbara Hill

Claimant's name

Autograph Before Me on

5/9/2023



Notary Public

Gershon Mahon
Notary Public, State of New York
No. 01MA6057990
Qualified in Kings County
Commission Expires April 30, 2027